

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION
DOCKET NO. 2021-9-E

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Dominion Energy South Carolina,)	
Incorporated's 2021 Integrated)	PETITION TO INTERVENE
Resource Plan (IRP) (See also Docket)	
No. 2019-226-E))	
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The South Carolina Coastal Conservation League ("CCL") and Southern Alliance for Clean Energy ("SACE") (collectively, "Petitioners") respectfully petition the Public Service Commission of South Carolina ("Commission") to intervene in the above-captioned docket pursuant to R.103-825 of the Commission's rules of practice and procedure. In support of this petition, Petitioners state as follows:

1. The South Carolina Energy Freedom Act ("EFA") provides for Commission review of each utility's IRP every three years. S.C. Code Ann. § 58-37-40(A), (C). In addition, utilities must submit annual updates to their "most recently accepted integrated resource plan, including but not limited to: energy and demand forecast, commodity fuel price inputs, renewable energy forecast, energy efficiency and demand-side management forecasts, [and] changes to projected retirement dates of existing units." S.C. Code Ann. § 58-37-40(D). Each IRP Update must also "describe the impact of the updated base planning assumptions on the selected resource plan." *Id.*

2. Pursuant to the EFA and Commission Order 2021-429, Dominion Energy South Carolina Incorporated's ("DESC" or "Company") submitted its 2021 Update to its Modified 2020 Integrated Resource Plan ("IRP") on August 17, 2021.

3. On August 25, 2021, the Commission consolidated the above-referenced DESC 2021 IRP Update docket with DESC's 2020 IRP docket (Docket No. 2019-226-E).

4. DESC's 2020 Modified IRP was filed in Docket No. 2019-226-E on February 19, 2021, pursuant to Commission Order No. 2020-832 rejecting the Company's Original 2020 IRP. On June 18, 2021, the Commission issued Order No. 2021-429, which approved DESC's Modified 2020 IRP but required the Company to include specific information and updated assumptions in its 2021 IRP Update. Specifically, the Commission required DESC to include in its 2021 IRP Update additional evaluation of near-term solar and storage, revised minimax regret and cost range analyses, substantive details about the peaking replacement plan proposed in Docket No. 2021-93-E, and several revised assumptions relating to EE/DSM savings goals and analyses.

5. Petitioners intervened and submitted testimony in DESC's 2020 IRP proceeding (Docket No. 2019-226-E) and have attended each of the DESC IRP Stakeholder Workshops.

6. CCL is a nonprofit corporation organized under the laws of the State of South Carolina whose mission is to protect the natural environment of the South Carolina coastal plain and to enhance the quality of life in its communities by working with individuals, businesses, and government to ensure balanced solutions. CCL and its members support the development of energy policy that is in the public interest of South Carolinians. CCL has members in South Carolina who receive electricity service from DESC and who are impacted by DESC's integrated resource planning, which influences decision-making about supply- and demand-side resources utilized and impacts the cost of electricity. The principal address of CCL is 131 Spring Street, Charleston, South Carolina 29402.

7. SACE is a nonprofit organization whose mission is to promote responsible and equitable energy choices to ensure clean, safe and healthy communities throughout the Southeast. SACE and its members are interested in promoting greater reliance on clean energy resources to meet the South's energy needs. Like CCL, SACE has members in South Carolina who receive electricity service from DESC and who are impacted by DESC's integrated resource planning, which influences decision-making about supply- and demand-side resources utilized and impacts the cost of electricity. SACE's principal address is P.O. Box 1842, Knoxville, Tennessee 37901. SACE also has offices in Georgia and North Carolina, and in-state staff in Florida and South Carolina.

8. Through their involvement in this proceeding, Petitioners seek to promote the adoption of near term renewables and clean energy alternatives, as well as transparent and robust resource planning. Petitioners also seek to ensure that DESC is undertaking an EFA-compliant planning process in which it properly considers and accurately estimates the cost of alternative supply and demand resources before investing further in gas-fueled replacement generation. Participation in this proceeding is aimed at supporting clean energy decisions that will lead to cleaner, safer, and healthier communities for all South Carolinians.

9. Pursuant to R. 103-804(T) of the Commission's Rules of Practice and Procedure, the Petitioners are represented by counsel in this proceeding:

Kate Lee Mixson
Southern Environmental Law Center
525 Bay Street, Suite 200
Charleston, SC 29403
Telephone: (843) 720-5270
Fax: (843) 414-7039

Emma C. Clancy
Southern Environmental Law Center
525 East Bay Street, Suite 200
Charleston, SC 29403
Telephone: (843) 720-5270
Fax: (843) 414-7039

WHEREFORE, Petitioners pray that they be allowed to intervene as a party of record and participate fully in this proceeding.

Respectfully submitted this 2nd day of September, 2021.

/s/ Kate Lee Mixson
SC Bar No. 104478
Southern Environmental Law Center
525 East Bay Street, Suite 200
Charleston, SC 29403
Telephone: (843) 720-5270
Fax: (843) 414-7039

/s/ Emma C. Clancy
SC Bar No. 105051
Southern Environmental Law Center
525 East Bay Street, Suite 200
Charleston, SC 29403
Telephone: (843) 720-5270
Fax: (843) 414-7039

*Attorneys for Petitioners South Carolina
Coastal Conservation League and
Southern Alliance for Clean Energy*

CERTIFICATE OF SERVICE

I hereby certify that the parties listed below have been served via first class U.S. Mail or electronic mail with a copy of the *Petition to Intervene* of the South Carolina Coastal Conservation League and Southern Alliance for Clean Energy.

Andrew M. Bateman, Counsel
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, South Carolina 29201
abateman@ors.sc.gov

Benjamin L. Snowden, Counsel
Kilpatrick Townsend & Stockton, LLP
4208 Six Forks Road, Suite 1400
Raleigh, North Carolina 27609
bsnowden@kilpatricktownsend.com

Christopher K. DeScherer, Counsel
Southern Environmental Law Center
525 East Bay Street, Suite 200
Charleston, South Carolina 29403
cdescherer@selcsc.org

Dorothy E. Jaffe, Attorney
Sierra Club
50 F Street NW Floor I
Washington, D.C. 20001
Dori.jaffe@sierraclub.org

Gudrun Elise Thompson, Counsel
Southern Environmental Law Center
601 Rosemary Street, Suite 220
Chapel Hill, North Carolina 27516
gthompson@selcnc.org

Jeffrey M. Nelson, Counsel
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, South Carolina 29201
jnelson@ors.sc.gov

Belton T. Zeigler, Counsel
Womble Bond Dickerson (US) LLP
1221 Main Street, Suite 1600
Columbia, South Carolina 29201
Belton.zeigler@wbd-us.com

Carri Grube Lybarker
Consumer Advocate
S.C. Department of Consumer Affairs
Post Office Box 5757
Columbia, South Carolina 29250
clybarker@scconsumer.gov

Courtney E. Walsh, Counsel
Nelson Mullins Riley & Scarborough,
LLP
Post Office Box 11070
Columbia, South Carolina 29211
Court.walsh@nelsonmullins.com

Frank S. Holleman, III, Counsel
Southern Environmental Law Center
46 Patton Avenue, Suite 304
Ashville, North Carolina 28801
fholleman@selcnc.org

James H. Goldin, Esquire
Nelson Mullins Riley & Scarborough,
LLP
1320 Main Street 17th Floor
Columbia, South Carolina 29210
Jamey.goldin@jamesygoldin.com

K. Chad Burgess, Deputy Gen.
Counsel
Dominion Energy Southeast Services,
Inc.
220 Operation Way – MC C222
Cayce, South Carolina 29033
Chad.burgess@dominionenergy.com

Matthew W. Gissendanner, Counsel
Dominion Energy Southeast Services, Inc.
220 Operation Way – MC C222
Cayce, South Carolina 29033
Matthew.gissendanner@dominionenergy.com

Nanette S. Edwards, Counsel
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, South Carolina 29201
nedwards@ors.sc.gov

Richard L. Whitt, Counsel
Whitt Law Firm, LLC
401 Western Lane, Suite E
Irmo, South Carolina 29063
richard@rlwhitt.law

Robert Guild
Robert Guild Attorney at law
314 Pall Mall Street
Columbia, South Carolina 29201
bguild@mindspring.com

Roger P. Hall, Dep. Consumer Advocate
S.C. Department of Consumer Affairs
Post Office Box 5757
Columbia, South Carolina 29250
rhall@scconsumer.gov

Weston Adams, III, Counsel
Nelson Mullins Riley & Scarborough,
LLP
Post Office Box 11070
Columbia, South Carolina 29211
Weston.adams@nelsonmullins.com

This 2nd day of September, 2021.

s/Kate Lee Mixson